
**Site Redress Plan
for the Exelon Generation Company, LLC
Early Site Permit**

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Description of Site Preparation Activities

The purpose of this chapter is to present information about site preparation activities that may be performed prior to construction of the Exelon Generation Company (EGC), Limited Liability Company (LLC) Early Site Permit (ESP) Facility in accordance with the requirements stipulated in Title 10 Code of Federal Regulations (CFR) 50. This chapter further provides information about the selected site. Contained in this chapter is the following information:

- Site Description and History (Section 1.1)
- Site Ownership (Section 1.2)
- Physical Activities (Section 1.3).

1.1 Site Description and History

The following sections provide a brief description and history of the selected site that must be redressed in the event that the ESP expires or the site is abandoned after site preparation work is done. The following sections specifically address the selected site location, community participation and relations, zoning, plant description; and present (2003) site conditions.

1.1.1 Selected Site Location

The EGC is the Applicant for this ESP and will hereafter be referred to as the EGC or Applicant. The site chosen by the Applicant for an ESP, as allowed under 10 CFR Part 52, Subpart A, is co-located at the existing nuclear power plant, the Clinton Power Station (CPS) Site. The chosen site will be hereinafter generally referred to as the EGC ESP Site. The CPS Site is owned by AmerGen Energy Company (AmerGen), LLC and located in Harp Township, DeWitt County, approximately 6 miles (mi) east of the City of Clinton in Illinois. The EGC ESP Facility will be located south of the existing CPS. The EGC ESP Facility is located between the cities of Bloomington and Decatur to the north and south, respectively, and Lincoln and Champaign-Urbana to the west and east, respectively.

1.1.2 Community Participation and Relations

Representatives from EGC contacted members of the surrounding community during the period of August 21 through September 1, 2002, to gather input from residents who may be affected by the construction, operation, and redress of the EGC ESP Facility. The representatives conducted interviews with approximately 40 community members to generalize the opinion of the community toward the possible building of an additional nuclear facility at the site. A Clinton Community Advisory Panel had been established for the purpose of community relations and communicates with the residents as needed. The general consensus was that the community was optimistic about the construction of the EGC ESP Facility. The surrounding community generally felt that the CPS was being operated safely and efficiently, and believed the EGC ESP Facility would operate just as safely and efficiently. The community also agreed that the EGC ESP Facility would greatly help the economy.

1.1.3 Zoning

As stated in Chapter 2 of the Environmental Report (ER) for the EGC ESP, the site of the EGC ESP Facility and the CPS is zoned as industrial.

1.1.4 Plant Description

The EGC ESP Facility will be essentially independent of the CPS. With the exception of using the CPS Ultimate Heat Sink (UHS) as an emergency source of makeup water, no CPS safety-related systems or equipment will be shared or cross-connected. Clinton Lake will be used as the normal source of makeup for the cooling water system. In addition, the existing CPS discharge flume will be modified, as necessary, to accommodate the additional outfall from the EGC ESP Facility.

The EGC ESP Facility will be a large industrial facility similar in general appearance to the existing CPS. A cooling tower or towers may be used for normal cooling depending on the selected cooling design.

The existing switchyard will be expanded to accommodate the output of the new facility and to provide the necessary off-site power. The switchyard area intended for the cancelled second reactor at the CPS will be utilized for this purpose and the existing transmission right-of-way will be used.

Raw water for cooling water makeup and other plant services will be provided from a new intake structure to be located on Clinton Lake adjacent to the existing CPS intake structure. Plant discharges will use the existing CPS discharge flume as a discharge path to Clinton Lake.

The locations for the new structures are depicted in Figure 2.1-4 and Figure 2.1-5 of the ER for the EGC ESP. Redress activities are discussed further in the following sections.

1.1.5 Present (2003) Site Condition

Initially, two identical units were planned at the CPS. However, construction on the second unit was canceled in 1983. A complete description of the present site conditions can be found in Chapter 2 of the ER for the EGC ESP and will not be repeated in this plan.

When the agreement between AmerGen and the Applicant is executed and AmerGen's rights to the EGC ESP Facility site are relinquished, the Applicant will photographically document and survey the site and pre-existing conditions prior to performing any preconstruction activities (see Section 1.2). The photographic record will be used as a baseline for returning the site to its pre-existing condition post-redress. In addition, the Applicant will perform an inventory of existing buildings and structures within the EGC ESP Site. The redress of disturbed areas that exist as part of the present site condition (i.e., prior to the onset of preconstruction activities) is not within the scope of this redress plan.

1.2 Site Ownership

Currently, AmerGen owns the selected site chosen for the location of the EGC ESP Facility. AmerGen owns and operates the CPS, and manages areas contiguous to the CPS.

Prior to the on-set of preconstruction activities, AmerGen will grant sufficient rights to the Applicant for the property that is the subject of the Application for the EGC ESP for the purposes of advancing the authorization granted by the issuance of an ESP or a limited work authorization.

1.3 Physical Activities

After the granting of the EGC ESP and at the Applicant's discretion, the Applicant may choose to perform none, some, or all of the activities listed below. Prerequisites to preconstruction activities that must be fulfilled prior to performing preconstruction activities include, but are not limited to the following:

- Documentation of existing site conditions within the EGC ESP Site;
- Coordination of the movement of the existing CPS protected area boundary, as required. These activities will be coordinated with the CPS to accomplish the movement of structures reflected in the CPS licensing basis in a manner consistent with its operating license and the applicable regulations governing that license;
- Movement, demolition, or ownership transfer of existing CPS buildings and structures within the EGC ESP Site. These activities will be coordinated with the CPS to accomplish the movement, demolition, or ownership transfer of structures reflected in the CPS licensing basis in a manner consistent with its operating license and the applicable regulations governing that license; and
- Obtaining the necessary permits to perform preconstruction activities, such as local building permits, Illinois Environmental Protection Agency (IEPA) National Pollutant Discharge Elimination System (NPDES) permit, IEPA Clean Water Act (CWA), IEPA General Stormwater Permit, etc.

Once the above list of prerequisites has been achieved, planned preconstruction activities may proceed and may include none, some, or all of the activities specified below:

- Preparation of the site for construction of the facility (including such activities as clearing, grading, construction of temporary access roads and borrow areas) as allowed by 10 CFR 50.10(e)(1)(i);
- Installation of temporary construction support facilities (including items such as warehouse and shop facilities, utilities, concrete mixing plants, docking and unloading facilities, and construction support buildings) as allowed by 10 CFR 50.10(e)(1)(ii);
- Excavation for facility structures as allowed by 10 CFR 50.10(e)(1)(iii);
- Construction of service facilities (including facilities such as roadways, paving, railroad spurs, fencing, exterior utility and lighting systems, transmission lines, and sanitary sewerage treatment facilities as allowed by 10 CFR 50.10(e)(1)(iv);
- Drilling sample/monitoring wells or additional geophysical borings as allowed by 10 CFR 50.10(e)(1)(v);
- Construction of plant cooling tower structures that are not safety-related as allowed by 10 CFR 50.10(e)(1)(v);
- Construction of plant intake structures that are not safety-related as allowed by 10 CFR 50.10(e)(1)(v);

- Installation of non-safety-related fire detection and protection equipment as allowed by 10 CFR 50.10(e)(1)(v);
- Expansion of the existing CPS switchyard to accommodate the construction of the proposed EGC ESP Facility;
- Expansion of the CPS transmission system;
- Modification of the existing CPS discharge flume, as necessary, to accommodate the EGC ESP Facility outflow; and
- Construction of any other additional structures, systems, and components, which do not prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public.

References

10 CFR 50. Code of Federal Regulations. "Domestic Licensing of Production and Utilization Facilities."

10 CFR 52. Code of Federal Regulations. "Early Site Permits; Standard Design Certification; and Combined Licenses for Nuclear Power Plants."

Site Redress Plan

Presented in this chapter is information that describes the applicable elements of the site redress plan, such as general information about the site redress plan, specific regulatory requirements that must be followed in the planning and implementation of redress activities, description of the site redress plan, any impacts to or associated with existing redress and decommissioning plans, and the financial responsibility of the Applicant regarding redress associated with any site preparation activities that have been performed in the event the ESP expires or the EGC ESP site is abandoned. This information is addressed in the following sections:

- General (Section 2.1)
- Site Redress Criteria (Section 2.2)
- Description of Redress Plan (Section 2.3)
- Impacts on Existing Redress and Decommissioning Plans (Section 2.4)
- Financial Responsibility (Section 2.5).

2.1 General

A redress plan is required if the Applicant intends to perform any of the activities allowed by 10 CFR 50.10(e)(1) without first obtaining the separate authorization required by that section. Specifically, the Applicant must determine the scope and extent of any site investigation or preparation activities to be conducted prior to applying for a construction permit. In addition, the Applicant must address such measures that may be necessary to restore the site to a condition suitable for other appropriate use in the event the project does not proceed to construction or the site is abandoned.

Site redress activities described in the Application for the EGC ESP are specific to the effect of planned preconstruction activities. For example, redress for limited site investigation activities will be much smaller in scope than redress associated with large-scale clearing, grading, or facility construction activities. Redress activities also reflect specific land use and zoning requirements of local municipal, county, and state jurisdictions, in addition to more broadly applicable federal requirements and industry standards.

Lastly, redress activities take into account both pre-existing site conditions and a range of potential future use scenarios including:

- Future site ownership and use;
- Habitat replacement, as applicable (e.g., wetlands, threatened and endangered species);
- Recontouring, revegetation, and replanting cleared areas;
- Potential liabilities associated with any facility or structure, which are to remain following the completion of redress activities; and
- Potential contamination left on site, either predating, or as a result of the Applicant's actions.

The overall objective of this plan is to reconfigure and redress the site as efficiently and effectively as possible to provide an environmentally stable, self-draining, self-maintaining, and aesthetically acceptable site that can be left unattended post-redress.

In planning for site redress, two general categories of conceptual options will be considered:

- Topographic approaches, which accomplish the overall objective and preserve the potential of the site for future industrial or other designated uses.
- Completion or addition of site development features that enhance the value of the site for future industrial or other designated uses.

If the EGC ESP expires or the Applicant abandons the reactor development and preconstruction activities have been performed, the Applicant will redress the site to pre-existing conditions (as depicted in the baseline photographic record) or to the specifications of the future owners in accordance with applicable regulations.

Redress activities will begin (in concert with the state or local land use authority and industrial development authorities) either at the time that the EGC ESP expires or when reactor construction plans are formally abandoned. This will include actions necessary to

terminate or transfer state and local permits and identify site features or improvements that will remain, and those that must be removed. A detailed redress scope and schedule will be implemented, consistent with this plan once the permit expires or reactor construction plans are abandoned. The schedule will include one year of preparation to secure additional input from regulators and local municipalities. Redress activities are expected to commence at the end of that year and will require two to five years to complete. The redress activities will comply with the applicable environmental requirements (local, state, federal). If, prior to commencement, industrial or other acceptable uses for the site are identified and committed to that are consistent with the development plan for the site, then redress of preconstruction activities would comply with these envisioned plans. At the Applicant's discretion, they may involve the local community in redress planning activities prior to performing any redress of the site.

2.2 Site Redress Criteria

Regulatory requirements for redress are contained in 10 CFR 50 and 10 CFR 52. Once site ownership is assured and the EGC ESP is granted, the Applicant plans to perform none, some, or all, of the activities listed in Section 1.3. The Applicant bases this redress plan on the requirements of 10 CFR 52.17(c). Redress carried out under this plan will achieve an environmentally stable and aesthetically acceptable site suitable for whatever non-nuclear use that conforms to state and local zoning laws. If the activities permitted by 10 CFR 50 are performed at the selected site, after an ESP has been granted, and this site is not referenced in an application for a construction permit under 10 CFR 50 or a combined operating license (COL) under 10 CFR 52, Subpart C while the permit remains valid, then the EGC ESP will remain in effect beyond its expiration date solely for the purposes of redressing the site. The Applicant agrees to redress the selected site in accordance with the terms of this Site Redress Plan for the EGC ESP as required by 10 CFR 52.17(c). If, before redress is complete, a use not envisioned in the redress plan is found for the site or parts thereof, the Applicant plans to follow the redress plan to the greatest extent practical consistent with the identified alternate use.

Prior to the commencement of site redress activities, environmental control of local water quality, air quality, stormwater runoff, solid waste, and the protection of critical ecological elements, if any, will be maintained in compliance with the approved IEPA NPDES Permit and IEPA CWA, local air quality standards, and local and site solid waste disposal criteria.

2.3 Description of Redress Plan

Presented in the following sections is information regarding planned physical activities that are allowed and may be performed prior to construction of the actual facility; controls that will be implemented during redress activities to limit impacts on- and off-site if site preparations activities are performed; restoration of the site to its baseline state following redress activities; and any potential liabilities. This information is discussed in detail in the following sub-sections:

- Physical Activities (Section 2.3.1)
- Controls to Mitigate Impacts During Redress Activities (Section 2.3.2)
- Future Site Ownership and Use (Section 2.3.3)
- Use of Applicant-Constructed Facilities for Future Use (Section 2.3.4)
- Habitat Replacement (Section 2.3.5)
- Restoration of Sensitive Water Resource Features (Section 2.3.6)
- Recontouring, Revegetation, and Replacement of Cleared Areas (Section 2.3.7)
- Potential Liabilities (Section 2.3.8)
- Potential Contamination (Section 2.3.9).

2.3.1 Physical Activities

As stated in Section 1.3, preconstruction activities are planned after the the EGC ESP is granted. The following section describes redress activities and controls to mitigate environmental impacts from those activities.

2.3.1.1 Redress of Test Wells or Borings

After application approval and the EGC ESP is granted, there may be a need to drill additional test and monitoring wells or boreholes that will have to be redressed. The Illinois Department of Public Health (IDPH) regulates water or monitoring well abandonment along with the IEPA Bureau of Land Programs. Any sampling wells, monitoring wells, or boreholes left in place prior to redress will be abandoned in accordance with these applicable state requirements.

2.3.1.2 Preparation of the Site for Construction of the EGC ESP Facility

Prior to initiating construction activities, the following activities will be performed in order to prepare for site construction activities:

- The necessary permits will be obtained to perform preconstruction activities, such as local building permits, IEPA NPDES, IEPA CWA, IEPA General Stormwater Permit, etc.
- The movement, demolition, or ownership transfer of existing buildings and structures within the proposed EGC ESP Site will occur.

- All or some of the selected site will be cleared of vegetation.
- Existing holes, if any, will be filled and the site graded to remove unwanted topographic features.
- The existing CPS protected area fence may be moved or expanded to accommodate preconstruction activities.
- If required, the selected site will be enclosed in a perimeter fence for liability and security reasons.
- Outside lighting will be installed to support the proposed preconstruction activities.
- Trenching will be performed to lay in underground utilities in order to service temporary support facilities and structures.
- Temporary borrow areas will be identified and access roads constructed to accommodate lay down areas and preconstruction activities.
- Warehouse and shop facilities, concrete mixing plants, docking and unloading facilities, and construction support buildings will be constructed.
- Railroad spurs will be extended or constructed to support the on- and off-site transportation of materials and equipment.
- The area along Clinton Lake where the proposed new intake structure will be constructed will be prepared for construction.
- The existing CPS discharge flume will be modified to accommodate the EGC ESP Plant outflow.
- Agreements will be made with the Regional Transmission Operator (RTO). In addition, if required, transmission lines will be upgraded in the event that the power demands and power production exceed the present (2003) line capabilities.
- Areas will also be identified for the EGC ESP Facility support structures and excavated prior to the construction of these facilities.
- Currently existing (2003) structures within the selected EGC ESP Site will be selectively evaluated and either retained, moved, or demolished.
- If required, new test or monitoring wells will be installed.
- Fire protection and detection systems will be installed to protect new structures.
- Existing roads may be relocated to accommodate the EGC ESP Facility structures or activities.

There are several borrow areas and access roads that were previously constructed in order to support the construction of the second proposed, but never completed, reactor unit at the CPS. These will be utilized to the fullest extent practical consistent with the plan for construction of the EGC ESP Facility.

2.3.1.2.1 Redress

In the event that the above activities are performed and the site permit expires before it is referenced in an application for a construction permit under 10 CFR 50 or a COL under 10 CFR 52, Subpart C, then the site will be redressed to achieve an environmentally stable and aesthetically acceptable site suitable so that non-nuclear use conforms with local zoning laws. Specifically, if it is not practical or warranted to sell or transfer the improvements to new owners, the structures, utilities, fences, paved roadways, etc., will be removed. In addition, the site will be regraded, revegetated, and restored to its pre-existing condition as documented by the baseline photographic record. Listed below are the items that will require redress:

- Test or monitoring wells, if any, will be redressed in accordance with IEPA requirements.
- Fire protection and detection systems will be removed, if necessary.
- If allowed, the perimeter fencing will be left in place for liability and security reasons.
- Facilities and structures will be demolished, unless deemed useful for future or existing industrial development; the demolition debris will be properly disposed at the site or area landfills.
- Useable equipment will be removed from the site and dispositioned accordingly.
- If necessary, underground utilities will be removed and terminated at the source.
- If necessary, overhead lighting and perimeter fencing will be removed from the site.
- If cooling towers have been constructed, they will be removed, if necessary, and dispositioned at the site or local area landfills.
- The new intake structure will be removed, if necessary, and the debris dispositioned accordingly at the site or area landfills. The shoreline will then be restored to its pre-existing condition.
- The CPS discharge flume will be redressed such that the flume no longer accommodates the EGC ESP Plant outflow.
- If necessary, transmission poles and lines will be removed and the lines will be terminated at the CPS switchyard.
- Asphalt roadways will be removed, if necessary, and dispositioned at area landfills or in accordance with local requirements.
- Gravel roadbeds will be recontoured to match the existing terrain and, if in excess, will be used as fill material during the recontouring phase.
- Borrow pits will be filled and graded for contour.
- Railroad spur extensions will be removed and dispositioned accordingly.

- Existing excavations, if any, will be filled and the site graded to remove unwanted topographic features. Additional fill material will be acquired as necessary to regrade and recontour the area appropriately.
- The site will be regraded, contoured, and re-seeded or surfaced with aggregate for erosion control and good self-drainage to existing sediment ponds or to Clinton Lake.

2.3.2 Controls to Mitigate Impacts During Redress Activities

Methods that will be utilized for environmental control and regulatory compliance during redress include noise control, traffic control, erosion and sediment controls, air quality control, control of potential pollutant sources (effluents, wastes, spills, and material handling), stock pile management, and spill prevention, control, and response.

2.3.2.1 Noise Control

During redress activities, ambient noise levels on and off site will increase. Noise levels will be controlled by an engineering design and compliance with the following criteria:

- Occupational Safety and Health Administration (OSHA) noise exposure limit to workers, and workers' annoyance determined through consideration of acceptable noise levels for offices, control rooms, etc. (29 CFR 1910);
- Federal noise pollution control regulations; and
- State or local noise pollution control regulations, as applicable.

The many pieces of large industrial equipment needed for demolition, clearing, excavating, grading, trash disposal, and land filling operations will be the source of noise pollution in the area. Standard noise dampening devices on trucks and other equipment are expected to be sufficient to keep off-site noise levels well below acceptable levels. In addition, major redress activities will be constrained to weekdays and other activities will be limited on weekends.

OSHA 29 CFR 1910.95 requires that a hearing conservation program be developed to control and protect on-site workers from excessive noise levels during redress activities. As stipulated in 29 CFR 1910, should noise levels become excessive, a hearing conservation program containing the following will be implemented:

- Hearing protection (earplugs or muffs) will be provided at no cost to employees.
- Noise monitoring will be conducted at the work location where employees are exposed to excessive noise.
- Annual audiometric exams will be provided for noise-exposed employees.
- Exposed employees will be notified of noise monitoring and audiometric exam results.
- Records will be kept of noise monitoring and audiometric exams results.
- Training will be provided on use/maintenance and limitations of hearing protection.

Procedures and a hearing conservation program will be developed at the site for redress activities.

2.3.2.2 Traffic Control

As discussed in Section 4.6 of the ER for the EGC ESP, the roads and highways within the immediate vicinity of the site will experience an increase in use during redress activities, especially at the beginning and end of the workday. The personnel involved in redress activities are expected to be living in areas dispersed nearly uniformly in all directions from the site, and will travel relatively uniformly in all directions. Thus, no significant congestion problems are expected due to the redress activities.

Traffic and traffic control impacts may include, but are not limited to:

- Working adjacent to or in active roadways (day/night);
- Traffic control zones;
- Traffic control device installation and removal;
- Flagging;
- Inspection and maintenance of traffic control devices;
- Heavy equipment; and
- General roadway traffic control zone safety.

During redress activities, traffic control on and off site will adhere to the applicable local, state, and federal requirements.

2.3.2.3 Erosion and Sediment Controls

It is anticipated that the majority of the area that is within the footprint of the EGC ESP Site will be paved, covered with gravel, or be covered by an existing structure prior to redress activities. The runoff from these areas will be collected and controlled by a stormwater drainage system, which will most probably discharge into Clinton Lake. During redress activities, disturbances to the existing ground surface will potentially increase the current sediment load via runoff to Clinton Lake. Site grading and drainage during redress will be designed to avoid erosion during the redress period and in compliance with a comprehensive Stormwater Pollution Prevention Plan (SWPPP), which is required by the Illinois Environmental Protection Agency, the Illinois Pollution Control Rules (35 Illinois Administrative Code [IAC], Subtitle C, Chapter I), and the federal CWA (33 United States Code 1251). Redress activities must be properly controlled and monitored or erosion from improperly graded areas could lead to the runoff of large amounts of sediments off site or to nearby surface waters. Redress activities at the selected site will conform to the following goals and criteria, as applicable, and if required:

- Erosion and sedimentation controls will comply with the requirements specified in this redress plan and, if appropriate, with a stormwater pollution prevention plan.
- Erosion and sediment controls will be implemented during redress to retain sediment on site to the greatest extent practicable.

- In accordance with the manufacturer's specifications and good engineering practices, control measures will be selected, installed, and maintained. If periodic inspections or other information indicate that a control measure is ineffective, the control measure will be modified or replaced as necessary.
- In the event that sediment escapes the site during redress activities, off-site accumulations of sediment will be removed to minimize off-site impacts, if possible.
- Sediment will be removed from sediment traps or sedimentation ponds as needed.
- Good housekeeping practices will be implemented that prevent litter, demolition debris, and chemicals exposed to stormwater from becoming a pollutant source for stormwater discharges.
- Erosion and sediment runoff will be controlled through the use of structural and/or stabilization practices. Structural control practices may include the use of straw bales, silt fences, earth dikes, drainage swales, sediment traps, and sediment basins. Stabilization practices may include temporary seeding, permanent seeding, mulching, geotextiles, sod stabilization, vegetative buffer strips, protection of trees, and preservation of mature vegetation.

Several different structural controls may be used to control the quality of the stormwater running off the site to Clinton Lake or the local community. Table 2.3-1 lists the controls that may be implemented during redress activities. The final location of these controls will be based on site conditions just prior to the commencement of redress activities.

Stabilization practices that may be implemented are listed in Table 2.3-2. Final stabilization will consist of revegetation at final grade conditions.

In addition, the following general erosion control requirements will be implemented during redress activities:

- Where practical, disturbed soil areas will be reseeded with maintenance seed (if activities are temporary) or permanent seed mix (for permanent or final cover) as soon as possible after redress activities are either temporarily or permanently stopped.
- Where practical, excelsior blankets will be mulched or installed and slopes greater than 3H:1V will be reseeded, depending on the length, exposure, and texture of the soils on the slope. Mulch may be natural and consist of slash, brush, manure, and vegetation previously chipped and stockpiled; clean straw, free from noxious weed seed, mold, and other harmful elements; or wood cellulose fiber. Mulch will be applied as soon as possible after seeding to reduce runoff and promote vegetation.
- Sidehill slopes will be furrow-contoured as practical. Otherwise the final grading will be performed in a manner that will result in tracks and depressions contoured across the slope instead of down the "fall-line." This will not only minimize wind erosion, but will also "roughen" the earth to provide a microclimate of wind protection for new plants, and will help conserve precipitation for use in growth of new seed. This results in a reduction of sediment erosion.
- The time that bare soil is exposed before stabilized will be minimized.

- The disturbance to existing vegetation will be minimized.
- Where slope cuts have developed from erosion (particularly along the faces of flood detention structures), loose material will be removed, and the area will be filled with suitable soils to the original profile of the bank or slightly above the original profile. If the cut is not completely filled, the steeper area at the brow of the cut will encourage erosion and may cause redevelopment of the cut. The area upstream from the cut will be carefully inspected to determine whether there is an irregularity in the ground profile that will cause stormwater to concentrate and erode the soils. Any such irregularity will be removed. This will allow the water to run off the site as sheet flow.
- No solid materials, including demolition materials, will be discharged to waters of the United States (U.S.), unless authorized under an approved permit.

The erosion and sediment control measures and other protection measures will be maintained in effective operating condition. Maintenance will be performed on an “as-needed” basis and as specified by state and local permits. Specific maintenance requirements include, but are not limited to:

- Routine removal of sediment and other debris collected behind silt fences or hay bales.
- Routine cleaning of sediment from detention ponds.
- Replacement of gravel and sediment from entrances/exits, as needed based on visual inspection.

2.3.2.4 Air Quality Controls

Dust, smoke, and engine exhaust are sources of air pollution. During redress activities, a number of controls will be imposed to mitigate air emissions from sources, including good drainage and dry weather wetting. In addition, the most traveled roads will be paved, to reduce dust generated by vehicular traffic. Bare areas will be seeded to provide ground cover, where necessary. Applicable air pollution control regulations will be adhered to as they relate to open burning or the operation of fuel burning equipment. Permits and operating certificates will be secured where required. Fuel burning equipment will be maintained in good mechanical order to reduce excessive emissions. Reasonable precautions will be taken to prevent accidental brush or forest fires. Water sprinkling of laydown, storage, and parking areas, unpaved roads, and other areas of the site will be used to control the resuspension of dust.

Overall air pollution impacts from redress activities are expected to be minimal. A slight increase in air emissions will result from the increase in vehicular traffic, and the generation of dust during redress. In Illinois, dust generated as a part of redress activities is exempt from state permit requirements pursuant to 35 IAC 201.146(tt). Nevertheless, dust emissions will be mitigated to the greatest extent practical.

2.3.2.5 Potential Pollutant Sources (Effluents, Wastes, Spills, and Material Handling)

During redress activities, there are many possible pollutant sources. Contained in the following sections is a list of possible pollutant sources and specific measures to control discharges of those pollutant sources on and off site during redress activities.

2.3.2.5.1 Vehicle Fueling

Fueling stations will have temporary secondary containment around the fuel tanks. For specifics, see Section 2.3.2.7.

2.3.2.5.2 Truck Washout/Decontamination Areas

Where truck washout and decontamination areas are necessary, they will be located on the site. Typically, these areas are located within an impoundment where the water is contained. No washwater will be allowed to run off the site or enter local, state, or federal waters.

2.3.2.5.3 Loading and Unloading Areas

Areas with reduced potential for spills to become pollution sources may be designated for loading and unloading. Cleanup in such 'designated areas' may occur less frequently, but no less than once per day. Soils or other materials spilled during loading and unloading (outside of designated areas) will be cleaned up promptly, including soils on the outside of the trucks (i.e., the side rails) and on the ground or road surface.

2.3.2.5.4 Vehicle and Equipment Maintenance

Vehicle and equipment maintenance activities, such as lubrication or equipment repair that could result in oil spills or grease spills, will be performed in an enclosed building, if practical, in an area designated for this purpose. Spills will be cleaned up promptly. Precautions will be taken to prevent the release of pollutants to the environment from vehicle maintenance. Precautions will include the use of drip pans, mats, and other similar methods. Oil contaminated materials will be stored in metal containers and disposed off site in accordance with state and local regulations. Spill kits will be maintained for prompt cleanup of oil spills.

2.3.2.5.5 Material Handling and Storage

The following material handling practices will be implemented during redress activities:

- Materials on the site will be stored in areas designated for that purpose.
- Suitable measures will be taken in storage areas to reduce the likelihood of a discharge, such as straw bale barriers around the storage area.
- Equipment not in use will be stored in a designated area.
- Used oil tanks will be emptied as frequently as necessary to avert overflow. The area will be kept free of trash and spilled oil. Tanks containing waste will have secondary containment.
- Garbage receptacles will be equipped with covers. This includes receptacles containing materials that may be carried by the wind or containing water-soluble materials (e.g., paint).
- Storage containers including drums and bags will be stored away from traffic to prevent accidental spills.
- Containers will be kept closed except as necessary to add or remove material.

- Containers will be stored in such a manner to prevent corrosion that could result from contact between the container and ground surface, which results in a release of material.
- Containers will be appropriately labeled to show the name, type of substance, health hazards, and other appropriate information.
- Material safety data sheets (MSDS) for substances used or stored on the site will be available for review and use.
- Hazardous substances such as used oil, anti-freeze, spent solvents, discarded paint cans, etc. will be controlled, stored and disposed of in accordance with the applicable MSDS.

2.3.2.6 Stock Pile Management

In general, stockpiles for redress activities will be managed in the following manner:

- Stockpiles of excavated soils will be placed on plastic sheeting or other suitable material, if required, near the excavation areas.
- If practical, stockpiles will be provided with liner, cover, and perimeter berm in order to prevent rupture, release or infiltration of liquids, and to prevent the re-suspension dispersion of dust. If it is not possible to cover stockpiles, the installation of a temporary sprinkler system to inhibit dust dispersion may be necessary.
- Polyethylene sheeting or other suitable material will be used for liners and covers.
- A perimeter berm, typically hay bales placed beneath the liner around the edge, will be constructed to allow for collection of any free liquids that drain from the stockpile.
- Accumulated free liquids will be pumped and treated, if required, or otherwise removed to a sanctioned area or container.
- Covers and perimeter berms will be secured in place when not in use and at the end of each workday, or as necessary to prevent wind dispersion or runoff from major precipitation events.

2.3.2.7 Spill Prevention, Control, and Response

The IEPA NPDES Permit will provide a description of procedures to be used for spill prevention and response. During redress, the project-specific waste management and health and safety plans will contain spill prevention, control, and response procedures that address site and activity specific conditions. These plans will be maintained on site. The general procedures for addressing spill prevention, control, and response are provided in the following sections.

2.3.2.7.1 Spill Prevention

Fuel and waste tanks located on soil will be bermed with a perimeter dike of suitable native material, or will be placed inside an open tank capable of containing 110 percent of the maximum capacity of the tank in case of rupture. When practical, the areas inside the dike will be covered with an oil resistant membrane to minimize soil contamination in the event of a spill.

Fuel and waste tanks located on concrete or steel foundations will be bermed with appropriate materials suitable for each application. These materials will allow for the containment of 110 percent capacity of the tank while minimizing contamination of the surrounding area.

Redress projects requiring fuel or waste tanks will maintain a sufficient number of spill kits to contain minor spills and leaks.

2.3.2.7.2 Mitigation of Spills

Fueling operations and vehicle maintenance will be performed at designated facilities, when practical.

Spill sumps will be constructed adjacent to fuel and oil tanks. Drip pans will be used underneath oil barrels to contain fluids that are used during redress activities. In addition, spills of toxic or hazardous materials will be reported promptly to an on-site authority or designee.

The following procedure will be followed for the cleanup of small spills:

- Upon detection of any spill, personal safety will be the first priority. Then the area of the spill and the nature of the spilled material will be evaluated in order to determine whether remedial actions could result in additional health hazards, escalation of the spill, or facility damage that may escalate the problem. If such conditions exist, a guard will be posted near the area (if practical) and the on-site authority, or designee, will be promptly notified.
- The source of the spill will be identified (if possible), and the flow of pollutants will be stopped if it can be done in a safe manner as described above.
- Pertinent facts and information will be recorded about the spill, including the following:
 - Type of pollutant;
 - Location;
 - Apparent source;
 - Estimated volume; and
 - Time of discovery.
- Absorbent materials will be spread on the area to soak up as much of the liquid as possible and prevent infiltration into the soil.
- As soon as possible, the contaminated soil and absorbent material will be excavated and transported to a designated site for collection of such material.
- If prompt transfer of the contaminated soil is not practical, the contaminated soil will be excavated and placed on polyethylene sheeting or other suitable material of sufficient thickness, and form a small berm to prevent breakout or infiltration.

The following procedure will be followed for the cleanup of medium to large spills:

- Upon detection of any spill, personal safety will be first priority. The area of the spill and the nature of the spilled material will be evaluated in order to determine whether remedial actions could result in additional health hazards, escalation of the spill, or facility damage that may escalate the problem. If such conditions exist, a guard will be posted near the area (if practical). In addition, the on-site health and safety personnel, or designees, and other parties will be promptly notified. The responsible on-site authority will, in turn, notify appropriate agencies (e.g., National Response Center).
- The source of the spill will be identified (if possible), and the flow of pollutants will be stopped if it can be done in a safe manner as described above.
- Pertinent facts and information will be recorded about the spill including the following:
 - Type of pollutant;
 - Location;
 - Apparent source;
 - Estimated volume; and
 - Time of discovery.
- Appropriate equipment (e.g., front-end loader) will be promptly dispatched to the spill and a berm or berms will be constructed downstream of it to minimize the spread.
- Additional resources will be mobilized as necessary to address the spill.
- Spill cleanup will commence when the lateral spread has been contained and the notifications have been made.
- Free liquid will be bailed or pumped into the appropriate container.
- When the liquid has been bailed to the soil layer, absorbent materials will be applied to the surface and transferred to the appropriate container.
- The remaining contaminated soils and absorbent material will be excavated and transferred to a temporary contaminant stockpile underlaid with polyethylene sheeting or other suitable material of sufficient thickness. The edges will be bermed to provide a dam to prevent inflow of water or leakage of the liquid.
- Contaminated soil and absorbent material will be disposed as appropriate.

2.3.2.7.3 National Response Center

The National Response Center will be contacted when a release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity occurs during a 24-hour period. This has been established under either 40 CFR 110, 40 CFR 117, or 40 CFR 302.

2.3.3 Future Site Ownership and Use

As detailed in Section 4.1.1.3 of the ER for the EGC ESP, there are no federal, state, or regional land use plans for the area. However, DeWitt County has published a countywide comprehensive plan, which designates the site for industrial land use (University of Illinois, 1992). This plan, which guides future land use throughout the county, has designated the site for transportation and utility use. Further, the county land use plan targets expansion and spin-off development from the existing power plant as ways to realize further economic development in DeWitt County.

Future site ownership and use might include the following:

- Development as an industrial complex;
- Coal gasification plant;
- Private sector experimental facility;
- Low level radioactive waste storage facility;
- Interim spent nuclear fuel storage area;
- Hazardous waste management facility;
- Experimental use by state and local municipalities;
- Local area land fill;
- Recreation area; or
- Some type of preserve.

Although any one of the specific uses identified above could emerge as a development option, it is highly unlikely that the area will be used for anything other than for industrial development.

2.3.4 Use of Applicant-Constructed Facilities for Future Use

If the land and any improvements cannot be sold to a commercial venture or re-industrialized, and if it is not practical or warranted to transfer or sell the improvements to the owners of the adjacent CPS or a local municipality, then the structures, utilities, fences, paved roadways, etc., will be removed. In addition, the site will be regraded, revegetated, and restored to its pre-existing condition, in accordance with state or local zoning laws and in compliance with local, state, and federal regulations.

2.3.5 Habitat Replacement

No habitat replacement activities are anticipated as part of this redress plan. Preconstruction activities will occur at the location of an existing power facility, specifically the CPS, which is designated for industrial use. The site is mostly comprised of impervious surfaces, crushed stone, existing structures, and contains no habitat or land use other than that designated specifically for the EGC ESP Facility and ancillary structures.

As summarized in Section 4.1 of the ER for the EGC ESP, the selected EGC ESP Site has no special agricultural resources (such as prime or unique farmland) because there is no land classified as agricultural within the EGC ESP Site. There are no known significant mineral resources (sand and gravel, coal, oil, natural gas, and/or ores) within the proposed site. With the exception of the new water intake structure area, no preconstruction or redress activities within the proposed site will take place within a floodplain, coastal zone, or wild and scenic river. There are four minor areas (less than 1 acre [ac]) within the CPS Site boundary that have been identified as wetland areas. None are within the EGC ESP Site, and therefore will not be impacted by preconstruction or redress activities. It is not anticipated that redress activities will impact agricultural areas, wetlands, a floodplain, or coastal zone, or visually impact a wild and scenic river.

Transmission system improvements will be required to support the EGC ESP Facility, but the Applicant does not anticipate any significant habitat replacement activities to be required from those improvements. Additions to the system and any redress will likely be the responsibility of the RTO. For the purposes of this redress plan, the Applicant has made several assumptions based on the existing transmission corridors and discussions with the RTO. For a complete discussion of the probable transmission corridor construction scenario, see Chapter 3.7 of the ER for the EGC ESP. The Applicant anticipates that any modifications will be located within or immediately adjacent to the existing substation at the CPS and along existing transmission corridors. The anticipated transmission line improvements will be sited entirely within the existing utility rights-of-way.

Construction of the proposed transmission line improvements will temporarily impact these lands and will be limited to the use of the existing access roadway along the right-of-way and the placement of footings for the poles. There will be no direct impacts outside of the existing utility right-of-way. The transmission line improvements will likely consist of the placement of new poles and the stringing of new lines along the existing maintained right-of-way. These limited disturbances will not adversely impact habitats nor require habitat replacement during redress activities.

As concluded in Section 4.3 of the ER for the EGC ESP, redress activities are not anticipated to adversely affect land use or habitats; wildlife resources; federally-listed threatened and endangered species; state-listed threatened and endangered species; species of commercial or recreational value; and important habitats at the site or in the site vicinity. Wildlife species, including species of recreational value, potentially occurring within the site or vicinity may be temporarily displaced during redress activities. It is expected that these species would return to the site or site vicinity following the completion of redress activities.

2.3.6 Restoration of Sensitive Water Resource Features

The following information regarding the restoration of sensitive water resource features is from Chapter 4 of the ER for the EGC ESP, and is summarized in the following sections.

2.3.6.1 Intake Structure

Redress of the EGC ESP Facility water intake structure will not significantly impact open water habitats of Clinton Lake. The new water intake structure area will be located in the vicinity of the CPS cooling water intake structures. The loss of open water habitat resulting from these redress activities, regarding the water intake structure, will be insignificant in

comparison to the amount of open water habitat found in Clinton Lake. When the site is redressed, the shoreline will be returned to its pre-existing state, unless state or local land use authorities agree that the structure may be left in place and not redressed.

2.3.6.2 Groundwater

The hydrologic alterations anticipated to result from redress activities might also include the temporary changes in groundwater levels from dewatering of any necessary excavations. It is not anticipated that any new excavations will be necessary during redress activities; therefore, dewatering will not be required.

2.3.6.3 Freshwater Streams

The dam located between the two fingers of Clinton Lake releases water from the lake to Salt Creek at a minimum rate of 5 cfs. Potential impacts to Salt Creek resulting from redress activities involving hydrologic alterations at the will be buffered by Clinton Lake. Proper safeguards will be used to minimize impacts to Clinton Lake during redress activities and thereby prevent long-term impacts to downstream habitats.

2.3.6.4 Lakes and Impoundments

During redress activities, Clinton Lake may be impacted due to increased erosion and sediment transport (i.e., water quality). However, this will be minimized by compliance with the controls specified in Section 2.3.2.3 of this redress plan. Redress activities that require erosion control measures will be in compliance with a SWPPP as required by the IEPA and the federal CWA (33 United States Code 1251). Where necessary, special erosion control measures will be implemented to minimize impacts to the lake, lake users and active CPS operations.

During redress activities, erosion control measures will be used to contain eroded soil on the site and remove sediment from stormwater prior to leaving the site. Design measures will be incorporated to avoid concentrated flow that has a high potential to transport sediment. Visual inspections of erosion control measures will be incorporated into the project to monitor the effectiveness of the control measures and to aid in determining if other mitigation measures are necessary. Mitigation measures will be incorporated into the requirements of the contract and the SWPPP. Beyond redress activities, stormwater management practices will be incorporated into the site design to minimize the long-term delivery of sediment to the lake.

Redress activities along Clinton Lake might include actions necessary to remediate any preparatory functions performed to accommodate the new intake structure for the EGC ESP Facility. The hydrologic alterations resulting from redress of the new intake structure area would be mainly related to sediment transport. If required to be removed, the area will be temporarily isolated from the lake by cofferdams, or like structures, and dewatered. The water will be pumped back into the lake so that changes in water quantity, circulation, or flow patterns are minimized. Redress of the intake structure area will be designed to control the shoreline and bank erosion in order to minimize impacts to Clinton Lake and the CPS UHS from increased sedimentation. Special erosion and siltation control measures will be incorporated with lakeshore redress activities in order to minimize these impacts. Any

significant sediment deposition in the immediate vicinity and in and around the CPS intake structure area will be removed.

2.3.7 Recontouring, Revegetation, and Replacement of Cleared Areas

As stated previously, if the land and any improvements cannot be sold to a commercial venture or re-industrialized, and if it is not practical or warranted to transfer or sell the improvements to the owners of the adjacent CPS or a local municipality, then the area will be redressed in accordance with this plan. As indicated herein, the site will be regraded, revegetated, and restored to its pre-existing condition, in accordance with state or local zoning laws and in compliance with local, state, and federal regulations.

2.3.8 Potential Liabilities

Once the Applicant has transferred ownership of any existing facilities or structures designated for re-use, completed the required redress activities, met the applicable regulatory requirements, and terminated the state and local permits, the Applicant will have no further liability with regard to site redress.

2.3.9 Potential Contamination

The area that has been selected for preconstruction activities is currently (2003) owned by AmerGen and is in close proximity to the CPS. The area has been identified as a clean area by the owner.

Any potential spills from preconstruction or redress activities will be remediated in compliance with the requirements of this plan. The area will be returned to its baseline state post-redress.

2.4 Impacts on Existing Redress and Decommissioning Plans

At the 2003 publication of this Application, the selected site is owned by AmerGen, and decommissioning of the CPS and contiguous areas is currently AmerGen's responsibility. Present CPS decontamination and decommissioning (D&D) plans include the site where the Applicant proposes to build the reactor. Once the Applicant has secured control of the selected site, CPS personnel will have to revisit and revise the present D&D plans to reflect this. It will be the Applicant's responsibility to redress the EGC ESP Site, in accordance with the requirements of this plan, in the event that the improvements are made and cannot be transferred to new owners. If the improvements are transferred to the owners of the CPS, redress of the improvements will be part of the CPS owners' D&D plans and, ultimately, the CPS owners' redress plan.

2.5 Financial Responsibility

In accordance with 2003 guidance, it is the financial responsibility of the Applicant to provide the funding to redress the EGC ESP Facility in the event that preconstruction activities are performed and reactor plans are abandoned, or if the site permit expires before it is referenced in an application for a construction permit or a COL.

In addition, as stated previously, if the land and any improvements cannot be sold to a commercial venture or re-industrialized, and if it is not practical or warranted to transfer or sell the improvements to the owners of the adjacent CPS or a local municipality, then the improvements will be redressed. If the improvements can be transferred, then the financial burden of redress resides with the new owners.

References

10 CFR 50. Code of Federal Regulations. "Domestic Licensing of Production and Utilization Facilities."

10 CFR 52. Code of Federal Regulations. "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants."

29 CFR 1910. Code of Federal Regulations. "General Industry Standards."

29 CFR 1926. Code of Federal Regulations. "Safety and Health Regulations for Construction."

40 CFR 110. Code of Federal Regulations. "Discharge of Oil."

40 CFR 117. Code of Federal Regulations. "Determination of Reportable Quantities of Hazardous Substances."

40 CFR 302. Code of Federal Regulations. "Designation, Reportable Quantities, and Notification."

35 Illinois Administrative Code (IAC) Subtitle C. Chapter I. Pollution Control Board. 1987.

33 United States Code 1251. Federal Clean Water Act. 1998.

University of Illinois at Urbana-Champaign (University of Illinois). *DeWitt County Comprehensive Plan*. 1992.

Tables

TABLE 2.3-1
Structural Control Measures

Control Measure	Location	Description of Control Measure
Silt Fencing	Along the perimeter of excavation sites. Drainage areas will be less than 0.25 ac per 100 ft of fence length.	To protect streams or wetland areas, to prevent erosion, and to keep sediment on site. Silt fencing consists of posts with filter fabric stretched across the posts. The lower end of the fence is vertically trenched and covered with back fill. This prevents water from passing by the fence without being filtered. The fabric allows for the water to pass off site while retaining the sediment on site.
Check Dams	If applicable where the grade change is more than 2%.	A check dam is a small, temporary dam constructed across a drainage ditch or channel. Its purpose is to slow down the speed of the concentrated flows. The reduced runoff speed will result in less erosion and gullying in the channel and allow the sediment to settle out. The check dams can be built with materials such as straw bales, rock, timber, or other materials that will retain water.
Straw Bales	Installed around areas requiring protection, such as wetlands, and around stockpiles to form a temporary containment.	Straw bales work much like silt fencing and may be used instead of a silt fence. They can be used to form a barrier or redirect water. They impede stormwater flow. Unlike a silt fence, straw bales do not allow water to flow through freely; thus, they are used where detention, not just filtration, is necessary.
Limit Entrance/Exit	Designated site entrances/exits. The exact location will be determined prior to the initiation of redress activities.	The purpose is to reduce tracking of soil off the site. These entrance/exits are usually constructed of fabric and large stone. The fabric is laid down on the soil; the rock is then applied on top of the fabric. The rough surface will shake and pull the soil off the tires.
Inlet Protection	Located around inlet areas to the stormwater sewer system.	Filtering material is placed around an inlet to a receiving stream to trap sediment. It can be composed of gravel, stone with a wire mesh filter, block and gravel, or straw bales.
Sediment Basins	As a best management practice, sediment basins should be used for drainage locations that serve 10 or more disturbed acres at one time. For drainage locations serving less than 10 ac, smaller sediment basins or sediment traps can be used.	Sediment basins are either temporary or permanent settling ponds with a controlled stormwater release structure. Their function is to collect and store sediment-laden stormwater from redress activities long enough to allow the sediment to settle out. At a minimum, silt fences, vegetative buffer strips, or equivalent sediment controls may be required.

TABLE 2.3-2
Stabilization Control Measures

Control Measure	Location	Description of Control Measure
Temporary Seeding	Disturbed areas where redress activities have temporarily ceased.	<p>Growing of a short-term vegetative cover on disturbed areas that may be in danger of erosion.</p> <p>Timeframe:</p> <p>Seeding is to be implemented as soon as practical.</p>
Mulching	On slopes steeper than 3:1 or on areas that have been seeded.	<p>Temporary soil stabilization or erosion control practices where materials, such as grass wood chips, hay, etc. are placed on the soil surface.</p> <p>Timeframe:</p> <p>Must be implemented as soon as practical after activity has ceased</p>
Preservation of Natural Vegetation	Wherever practical.	<p>Wherever practical, existing vegetation will be retained. It minimizes erosion potential and protects water quality. The preservation of natural vegetation between the silt fence and stream will provide additional water quality improvement prior to the stormwater entering state waters.</p>
Permanent Seeding	On appropriate disturbed areas once redress activities are complete	<p>Provides stabilization of the soil and reduces erosion.</p> <p>Timeframe:</p> <p>As soon as practical and if deemed appropriate.</p>
Surfaced with Aggregate	On appropriate disturbed areas once redress activities are complete,	<p>Provides stabilization of the soil and reduces erosion.</p> <p>Timeframe:</p> <p>As soon as practical and if deemed appropriate.</p>